

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: LUIS A. GONZALEZ**

**Debtor,**

**: CHAPTER 13**

**: No. 17-11285-ref**

**:**

**: Date of Hearing: September 6, 2018**

**: Time of Hearing: 9:30 a.m.**

**: Location: U.S. Bankruptcy Court**

**The Madison Building  
3<sup>rd</sup> Floor, Courtroom 1  
400 Washington Street  
Reading, PA 19601**

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

The Debtor, Luis A. Gonzalez, has filed a **Motion to Avoid the Judicial Lien of CAPITAL ONE BANK USA NA (“CAPITAL ONE”)** with the Court for an Order declaring the Judicial Lien of **CAPITAL ONE**, in its entirety, null and void and of no effect whatsoever.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this Bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion, then on or before **August 22, 2018**, you or your attorney must do all of the following:

- a) file an answer explaining your position at:

**United States Bankruptcy Court  
The Madison Building  
400 Washington Street, Suite 300  
Reading, PA 19601**

If you mail your answer to the Bankruptcy Clerk’s Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- b) mail a copy to the Movant’s attorney:

**Thomas L. Lightner, Esquire  
LIGHTNER LAW OFFICES, P.C.  
4652 Hamilton Boulevard  
Allentown, PA 18103**

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable RICHARD E. FEHLING, United States Bankruptcy Judge, in Courtroom #1 at the United States Bankruptcy Court, The Madison Building, **400 Washington Street, Reading, PA 19601** on September 6, 2018, at 9:30 a.m., as soon thereafter as counsel can be heard, to consider the motion.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at (610) 208-5040 to find out whether the hearing has been canceled because an answer was not filed.

Dated: August 7, 2018

/s/ Thomas L. Lightner, Esquire  
Thomas L. Lightner, Esquire  
Lightner Law Offices, P.C.  
4652 Hamilton Blvd.  
Allentown, PA 18103  
Attorney for Debtor